

1 A No.

2 Q Now I believe you told me before that you had
3 individual complainants' files set up so that you could
4 look alphabetically and see what was in that person's
5 file?

6 A Yes.

7 Q Did you review the Smiths' file before going
8 to their house?

9 A Not that I recall.

10 Q Now when you were at the Smith household, the
11 station wasn't turned off, right, so that you could see
12 what the TV reception looked like with KOKS off the
13 air?

14 A No.

15 Q Okay. I could probably save a little bit of
16 time. I could ask a blanket question. When you were
17 at individuals' households to effect repairs, the
18 station was never turned off, right, so that you could
19 see the effect?

20 A No.

21 Q Okay. So I won't have to ask relative to
22 each individual.

23 A Okay. We had no instrument to show the
24 individual that we had turned the power off.

25 Q Now moving on to paragraph 21, there is a

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 reference about, beginning six or seven lines down,
2 that you twice -- do you see that? -- asked Mrs. Hillis
3 if you could make an appointment?

4 A Uh-huh.

5 Q Okay. And do you recall those calls?

6 A I recall making, yes, those calls.

7 Q Okay. And these, what time period are we
8 talking about here?

9 A Oh, within the first month or two.

10 Q All right. And there is a reference there to
11 filters. Do you know what filters are being referenced
12 there?

13 A I don't know. She just made the statement,
14 "Your filters don't work."

15 Q Now do you recall going to the Hillis
16 household in early 1990?

17 A Yes.

18 Q And you were accompanied by Mr. Lampe?

19 A Yes.

20 Q And Mr. Hillis was the only one you spoke to?

21 A Yes.

22 Q Now did you observe the reception on any of
23 the Hillises' TVs when you were in the household?

24 A On the TV in what I guess they call the
25 living room or family room there.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q You did observe, though?

2 A Yes.

3 Q Okay. Did you ask Mr. Hillis what his
4 reception was like before KOKS came on the air?

5 A No, I did not do the talking. Mr. Lampe did
6 the talking.

7 Q Okay. Was there any such conversation?

8 A I do not recall it.

9 Q Did you listen to any radio in the Hillis
10 household when you were there?

11 A Tape player.

12 Q But not a radio?

13 A No, I don't remember listening to a radio. I
14 remember listening to the tape player.

15 Q Okay. Now prior to going to the Hillis
16 household, had you looked at the Hillis file to see
17 what complaints they had made?

18 A I don't recall doing that.

19 Q Did you ever alert Mr. Lampe that you had
20 such information? In other words, the files with --

21 A He, I am sure, had been talking if we had
22 mentioned them.

23 Q Okay. Now I am looking at the last two
24 sentences or the last three sentences on paragraph 21,
25 and the indication there is that Mr. Hillis was

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | supposed to send you a list. Right?

2 | A Yes.

3 | Q And that apparently he didn't do that?

4 | A That is correct.

5 | Q But he has already sent in a number of
6 | complaints, hasn't he?

7 | A When Mr. Lampe and I were there, he had
8 | several complaints, and Mr. Lampe was unsure of exactly
9 | what he was complaining about. So Mr. Lampe asked him
10 | would he just write it all down, and that way Mr. Lampe
11 | would have the list so that he could work to solve
12 | whatever problem that Mr. Hillis had.

13 | Q Right. But, I mean, Mr. Hillis has already
14 | gone through an exercise of submitting complaints,
15 | hasn't he?

16 | A That did not take in all of the complaints
17 | that he had that day.

18 | Q Okay. I would like to refer you to Mass
19 | Media Exhibit No. 17. Okay. On page 3, under
20 | "Miscellaneous Responses."

21 | A All right.

22 | Q Do you see that?

23 | A Yes.

24 | Q Okay. The sentence beginning in the fourth
25 | line down?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Yes.

2 Q Okay. That was information that you

3 transmitted to counsel?

4 A Yes.

5 Q And I would like to refer you to page of that

6 exhibit.

7 A Eighty-five? All right.

8 Q Do you see the reference there to Jean

9 Hillis?

10 A Yes.

11 Q All right. Do you recall that making -- you

12 prepared this? Right?

13 A Yes, I did.

14 Q Okay. And you had the conversation with her?

15 A Yes.

16 Q All right. I would like you now to refer to

17 Mass Media Exhibit No. 18.

18 A Eighteen? Okay.

19 Q Okay. Page 3.

20 A Okay.

21 Q Do you see the section beginning with

22 "William Hillis's complaint"?

23 A Yes.

24 Q Okay. Was this information that you

25 transmitted to counsel?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Let me read it first.

2 Q Yes, ma'am.

3 (Pause.)

4 Q I had asked a question. I guess you forgot

5 while you were reading it?

6 A I sure did.

7 Q That's fine. Did you transmit this

8 information to counsel?

9 A Yes.

10 Q Now were you aware at the time this

11 information that was transmitted that William Hillis

12 and Jean Hillis were husband and wife?

13 A Yes.

14 Q Okay. Now I would like you to refer to Mass

15 Media Exhibit 3.

16 A Three?

17 Q Specifically page 7.

18 A Okay.

19 Q Now do you recall having seen Mass Media

20 Exhibit 3, page 7, in either late 1989 or very early

21 1990?

22 A Yes.

23 Q This was mailed by Jean Hillis to you.

24 Right? Or to the station?

25 A No, this was mailed to the FCC and then

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 mailed to us, I think.

2 Q Okay. Well, in other words, you did get it,
3 though?

4 A Yes.

5 Q All right. I would like you to read to
6 yourself paragraphs 4 through 9.

7 A Four through nine?

8 Q Yes, ma'am.

9 (Pause.)

10 Q Okay. You had read this before?

11 A Yes.

12 Q I mean, you had read it about the time you
13 received it?

14 A Yes.

15 Q You read through it when you received it?

16 A Yes. This does not involve some of the
17 complaints that Mr. Hillis had at the time we were
18 there. He had other complaints, and that is the reason
19 that Mr. Lampe asked him to make a list.

20 Q Okay. When you received Mass Media Exhibit
21 3, pages 7 and 8, did you bring these pages to the
22 attention of Mr. Lampe?

23 A No, I didn't.

24 Q Is there any reason why you didn't?

25 A We were still hoping that Mr. Hillis would

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 explain what he wanted done.

2 Q Well, now you have already indicated to me
3 that you knew that Mr. and Mrs. Hillis are husband and
4 wife.

5 A That is correct.

6 Q And here is Mrs. Hillis telling you what the
7 problem is.

8 A He had other complaints.

9 Q Right. But, I mean, what other complaints --
10 what are you supposed to do about the other complaints
11 that you wouldn't do or that shouldn't be done relative
12 to the complaints that are here?

13 A We just felt that if he would put it in --
14 give us a list of his complaints, then Mr. Lampe said
15 that he could go in there and do the complete work that
16 needed to be, that Mr. Hillis and Mrs. Hillis both
17 wanted done; that he felt that he -- Mr. Lampe said
18 that he really felt that he needed this list from Mr.
19 Hillis so that we could end this thing once and for
20 all. We wanted to try to satisfy and end it, if
21 possible.

22 JUDGE STIRMER: Well, what did you do to
23 correct the complaints that appear on page 7 of Bureau
24 Exhibit 3?

25 THE WITNESS: Page 7? At that time, we would

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 still -- like I said, we were still wanting Mr. Hillis
2 to give us a list.

3 JUDGE STIRMER: Well, wait a minute now.

4 THE WITNESS: Yes, sir.

5 JUDGE STIRMER: This contains a number of
6 complaints.

7 THE WITNESS: Yes, sir.

8 JUDGE STIRMER: And Bureau counsel directed
9 your attention to those complaints.

10 THE WITNESS: Yes.

11 JUDGE STIRMER: What, if anything, did you do
12 to correct these complaints?

13 THE WITNESS: At that present time, we did
14 not do anything. Mrs. Hillis kept saying, "Our filters
15 do not work." She did not like our filters.

16 JUDGE STIRMER: All right.

17 BY MR. SHOOK:

18 Q Okay. Now I am a little confused about
19 something here.

20 A Uh-huh.

21 Q Now I know you have testified about Mrs.
22 Hillis saying, you know, that she didn't want you to
23 come over because the filters weren't going to work.
24 Now in Mass Media Exhibit 17, page 3, it reflects that
25 complaints, various complaints are awaiting resolution

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | because there is unavailability of necessary filters,
2 | and Jean Hillis is one of the persons named there.

3 | A That is correct. That is correct.

4 | Q And the conversations that I thought you
5 | indicated that you had with Mrs. Hillis where she
6 | didn't want to come over were within the first couple
7 | of months of the radio station coming on the air?

8 | A Yes. What I am stating here is that as
9 | filters, as these filters, as new filters come in, I am
10 | going to try again. I'm going to try again. I kept
11 | wanting to see if we could resolve it. When this was
12 | made up, there was no filters in at that time.

13 | Q Okay.

14 | A When they came in, I was going to try again.

15 | Q All right. Now on page 85 of that exhibit --
16 | (Pause.)

17 | A All right.

18 | Q All right. Now there is a reference there to
19 | a conversation with Jean Hillis?

20 | A Uh-huh.

21 | Q And it says that you and she talked?

22 | A Uh-huh.

23 | Q And that you would call her when the filters
24 | came in?

25 | A Yes.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q And that she said that was all right?

2 A She said it was all right. When I called
3 her, she said she did not want our filters; our filters
4 don't work.

5 Q Okay. I am having a little trouble
6 understanding how this is consistent. Unless there is
7 something missing here, I am missing it. What this
8 says to me is that you conversed with her on the 10th
9 of January of 1989.

10 A Uh-huh.

11 Q You are not going there because you don't
12 have the filters.

13 A Right.

14 Q She says, "All right."

15 A Yes.

16 Q Now what is that "All right" supposed to mean
17 here to you and to us?

18 A That's all right for me to call her.

19 Q I mean, it says --

20 A That it's all right for me to call her back.

21 Q Okay. But it is not all right for you to go
22 over?

23 A We would decide that when I called back. I
24 am sure that is what she meant. She just said it's all
25 right. She said, "All right." That was the way I took

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | it, that when the filters come in I could call her
2 | back.

3 | Q Okay. And then you did go to the house in
4 | the March?

5 | A Yes.

6 | Q Or you went to the house subsequently?

7 | A Yes, yes, yes.

8 | Q And you wanted Mr. Hillis to submit a list of
9 | his problems?

10 | A Mr. Lampe asked Mr. Hillis to do that, yes.

11 | Q Okay. Now by that time had the filters come
12 | in?

13 | A Yes, there were some filters then.

14 | Q All right. Was any telephone call made to
15 | either of the Hillises to try to arrange a time for you
16 | to come over to install?

17 | A Just this, in March of '89. And Mr. Lampe
18 | told me that he felt like he really needed that list so
19 | that we could get the problem cleared up once and for
20 | all.

21 | Q Now I would like you to refer to paragraph 22
22 | of your testimony.

23 | A Yes.

24 | Q Okay. The reference there to, "The Hillises
25 | said it was from the Highway Patrol." Do you see that?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 It is about two-thirds of the way down.

2 A Is it on page 19?

3 Q Yes, ma'am.

4 A Oh, yes. Yes.

5 Q All right. Was that remark made to you by

6 one or both of the Hillises?

7 A Just Jean Hillis.

8 Q Jean Hillis? Now in terms of the next

9 sentence, do you see the next sentence, "When we left

10 Channel 12," etc.?

11 A Yes.

12 Q Do you see that?

13 A Yes, sir.

14 Q Okay. And do you also see the reference

15 there, "but no FM blanketing interference?"

16 A Yes.

17 Q Now we have already determined, right, that

18 the station KOKS was never turned off while you were at

19 anybody's house?

20 A Correct.

21 Q All right. What led you to conclude that

22 there was no blanketing interference?

23 A We heard no audio of KOKS, saw no lines.

24 Q Okay. And had you heard audio and/or seen

25 lines before?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A When we were there, when Mr. Lampe and I were
2 there in March of '89, there as KOKS audio on Channel
3 6. At this time, Mr. Hillis had everything unhooked.
4 There was no way of seeing what it was before we came
5 in.

6 Q Okay. Now I would like you to refer to Mass
7 Media Exhibit No. 27, pages 2 and 3.

8 A Yes.

9 Q Now is this a contemporaneous written record
10 of your visit to the Hillis household?

11 A Yes.

12 Q Now this was prepared by you?

13 A Yes.

14 Q Or at least page 2 was? Correct?

15 A Page 2 and 3 both.

16 Q Oh. Now is the handwriting that appears on
17 page 3 yours?

18 A Yes.

19 Q All right. Is there any reference on either
20 page 2 or 3 to the Highway Patrol?

21 A Not that I see.

22 Q Okay. Do you have any explanation as to why
23 there isn't any such reference?

24 A Just failed to include it.

25 MR. SHOOK: Your Honor?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 JUDGE STIRMER: Yes.

2 MR. SHOOK: With respect to the fifth line up
3 from the bottom of page 19 in the exhibit of Mrs.
4 Stewart, the area in parentheses that reads, "but no FM
5 blanketing interference."

6 JUDGE STIRMER: Yes.

7 MR. SHOOK: Your Honor, on the basis of this
8 testimony, I would move to strike that portion of her
9 testimony.

10 JUDGE STIRMER: How do you know there was no
11 FM blanketing interference?

12 THE WITNESS: There was KOKS audio coming
13 through. It usually came, the Channel 6, the
14 blanketing of KOKS on Channel 6 would blank out the
15 picture, and also they would get the KOKS audio on.

16 JUDGE STIRMER: Well, that doesn't
17 necessarily mean that is the only possibility of
18 blanketing, does it?

19 THE WITNESS: The herringbone lines and the
20 blanketing out and the audio is the only FM blanketing
21 that I have experienced, sir.

22 JUDGE STIRMER: Now you indicate that Channel
23 6 had snow and lines.

24 THE WITNESS: Yes.

25 JUDGE STIRMER: Now how do you know that the

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 | lines in this picture wasn't attributable to
2 | blanketing?

3 | THE WITNESS: Mr. Lampe said that was
4 | attributable to a weak signal.

5 | JUDGE STIRMER: Well, you don't know that a
6 | for a fact. You are just relying on what Mr. Lampe
7 | told you?

8 | THE WITNESS: That's -- yes, that's true,
9 | sir.

10 | JUDGE STIRMER: All right. Strike it.

11 | BY MR. SHOOK:

12 | Q Now when you were at the Hillis household,
13 | was there any discussion about restoration of service
14 | to more than one television?

15 | A No.

16 | Q Were you aware that the Hillises had more
17 | than one television?

18 | A Yes.

19 | Q And how were you aware of that?

20 | A On the previous visit in March of '89.

21 | Q Okay.

22 | A He had a little portable that he had showed
23 | us in the boys' bedroom.

24 | Q All right. So there were two televisions?

25 | A There was a portable, a little portable.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Was there any conversation with the Hillises
2 about repairing or restoring service to any radio that
3 they had?

4 A I don't recall.

5 Q Focusing now on paragraph 23 of your
6 testimony.

7 A Okay.

8 Q Do you see in the second sentence that there
9 was a reference there to a statement made by Mrs. Diehl
10 to you?

11 A The second?

12 Q The second sentence in paragraph 23?

13 A Uh-huh.

14 Q Okay. She told you that her problem was
15 Channel 6?

16 A Yes.

17 Q Okay. I would like you to refer to Mass
18 Media Exhibit No. 17.

19 A Okay.

20 Q On page 12.

21 A Okay.

22 Q Okay. Do you see the part up at the top
23 where it references three different calls?

24 A Yes.

25 Q Two of which had no answer?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A Yes.

2 Q Okay. Now do you also see underneath, down
3 toward the bottom, the items that are circled?

4 A Yes.

5 Q Okay. Do you see that "Radios" are circled.

6 A Yes.

7 Q Do you recall asking Cindy Diehl about her
8 radios?

9 A No, and I don't recall her saying anything
10 about it either.

11 Q Well, now you called her.

12 A Yes.

13 Q You called her because you had a copy of this
14 page in front of you. Right? Page No. 12?

15 A Yes.

16 Q So you are looking at this, and there are a
17 number of things circled down at the bottom in terms of
18 what she is complaining about?

19 A Uh-huh.

20 Q Okay. So you called her, and somehow Channel
21 6 was mentioned?

22 A She said that she was having problems with
23 Channel 6.

24 Q Okay. But you didn't ask her about the other
25 things that she had circled?

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 A No. She didn't mention anything else. She
2 just said that she was having problems with Channel 6.

3 Q Right. But you didn't ask her about the
4 other things that were circled?

5 A No.

6 MR. SHOOK: Okay. Your Honor, I would like
7 to move on to paragraph 24. There are a number of
8 questions that I asked her this morning about Mary
9 Wynn, and I don't want to repeat those. So if you
10 would give me one minute to make sure that I don't do
11 that. Could we go off the record for one minute?

12 JUDGE STIRMER: All right. Off the record
13 for a moment.

14 (Off the record.)

15 (Back on the record.)

16 JUDGE STIRMER: Back on the record.

17 BY MR. SHOOK:

18 Q Mrs. Stewart, if I recall correctly, this
19 morning we discussed Mary Wynn's situation. And if I
20 remember right, you had indicated that you were at her
21 house, I guess it was three different times?

22 A Yes.

23 Q Twice in 1989 and once in 1991?

24 A Yes.

25 Q Now reading through paragraph 24, I don't see

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 any reference to a second visit in 1989.

2 A Yes, that was through my fault. I omitted
3 that one.

4 Q All right.

5 A It was a failure on my part.

6 Q So you did have another visit, though?

7 A Yes. It was just a failure on my part.

8 Q Now three lines up from the bottom, there is
9 a reference to a call from Mary Wynn to you?

10 A Yes.

11 Q Or was it to you, or was it to --

12 A It was t someone at the station, and they
13 left a note that said for me to call her, and I called.
14 I called Mrs. Wynn.

15 Q You did call her?

16 A Yes.

17 Q All right. And what did Mary Wynn tell you
18 in terms of what her problem was or what she wanted to
19 have done?

20 A She just said that she had purchased a filter
21 from A-1 Electronics and wanted to know if I would pay
22 her for it. And I said, "Well, how about me just
23 bringing you another filter?" And she said that would
24 be fine.

25 Q All right. And you recall making another

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 trip to her house then?

2 A Yes.

3 Q Now your understanding of what -- what was
4 Mary Wynn going to get back from the exchange of the
5 filter? Just the cost of the filter itself?

6 A I don't understand the question.

7 Q Okay. Well, I mean, she wasn't going to be
8 reimbursed for the repair visit, was she?

9 A I don't know. We didn't discuss that. She
10 didn't say anything about it.

11 Q All right. But, I mean, your understanding
12 of how this scenario was supposed to work was that she
13 was going to take off the filter that she paid to have
14 installed on her TV and then get money back for the
15 filter?

16 A This could possibly be done.

17 Q I mean, that is what you understood? That
18 was essentially what your conversation with her was?

19 A I just told her, I said, "I can bring you
20 another filter." And she said, "All right, that's
21 fine." And maybe in the back of my mind that's what I
22 had in mind, that she could return the other one and
23 get her money back. It was never spoken.

24 Q All right. Now moving on to paragraph 25. I
25 would like to focus your attention on Mass Media

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Exhibit 17, page 2.

2 A Yes.

3 Q All right. Under "Complaints Resolved," the
4 name Leatha Piper appears?

5 A Yes.

6 Q And that was information that you transmitted
7 to counsel? Right?

8 A Yes.

9 Q Okay. Also to page 48 of that exhibit.

10 A All right.

11 Q Have you seen this page before?

12 A Yes.

13 Q And is that note at the top something that
14 you had typed in?

15 A Yes.

16 Q So you went to her house?

17 A Yes.

18 Q And the filter that you put on affected the
19 reception on Channel 15?

20 A Yes. I believe the reason it did was that it
21 gave her something to pull 15 in better, because it was
22 just a string filter. And that gives -- we found that
23 it somehow with 15. They didn't have anything to pull
24 15 in, but if you hang a string filter on there, that
25 gave it something, 15 to latch onto.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Now you aware, were you not, though, of
2 subsequent complaints filed by Leatha Piper?

3 A Yes.

4 Q Okay. Moving on to paragraph 26.

5 A Okay.

6 Q I would like you to refer to Mass Media
7 Exhibit No. 19, page 2. Now under "Complaints Cured,"
8 it is Section VI. Do you see that, Roman numeral VI?

9 A Yes.

10 Q All right. There is a name at the very end.
11 It looks like Elaine Libes, L-I-B-E-S?

12 A Yes.

13 Q All right. Now that was information that you
14 transmitted to counsel?

15 A Yes.

16 Q It is your understanding that the
17 Elaine Libes referred to here is Mrs. Libla?

18 A Yes.

19 Q The one who is referenced in paragraph 26 of
20 your testimony?

21 A Yes.

22 Q Okay. Also in that exhibit, pages 59 and 60.
23 Now was page 59 something that you prepared?

24 A Yes.

25 Q So you were the person who went to

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Elaine Libla's house?

2 A Yes.

3 Q And that was in response to what you see on
4 page 60?

5 A Yes.

6 Q Now I would like you to refer to Mass Media
7 Exhibit 21, No. 54. On page 14, rather, No. 54.

8 A Page 14?

9 Q Yes, ma'am.

10 A Yes.

11 Q And this was information that you transmitted
12 to counsel?

13 A Yes.

14 Q And that Elaine Liber, L-I-B-E-R, that is the
15 same Elaine Libla?

16 A Yes, the same.

17 Q Okay. Just so that we all don't get confused
18 here. All right. With respect to your testimony on
19 page 22, paragraph 27. Now I believe we went over the
20 Gray situation this morning, so I am going to move on
21 to paragraph 28.

22 A Uh-huh.

23 Q Now the reference in the second sentence to
24 Mrs. Mary Freeman, the second sentence of paragraph 28?

25 A Uh-huh.

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947

1 Q Okay. How is that you ascertained that
2 Mary Freeman was Clyde Freeman's wife?

3 A The same address.

4 Q Okay. Did you ultimately learn that
5 Mary Freeman is not the wife, but Clara Freeman is?

6 A No, I did not.

7 Q You did not?

8 A I did not know that.

9 Q Now I would like you to refer to Mass Media
10 Exhibit No. 19, page 2.

11 A Yes.

12 Q Under "Complaints Cured"?

13 A Yes.

14 Q The reference to "Clyde/Clara Freeman"?

15 A Yes.

16 Q This was information that you transmitted to
17 counsel?

18 A Yes.

19 Q Page 68 of that exhibit. Okay. Do you see
20 two signatures down at the bottom?

21 A Yes.

22 Q Clyde Freeman and Clara Freeman?

23 A Yes, I do.

24 Q Okay. Now the note up at the top, "Went to
25 this home. Installed a filter. Reception very much

FREE STATE REPORTING, INC.

Court Reporting Depositions
D.C. Area 261-1902
Balt. & Annap. 974-0947